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*Attorneys for Plaintiff individually and on
 behalf of all others similarly situated*

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ADVANCED INTERVENTIONAL PAIN
 & DIAGNOSTICS OF WESTERN
 ARKANSAS, LLC, on behalf of itself and
 all others similarly situated,

Plaintiff,

v.

PARADIGM MANAGEMENT
 SERVICES, LLC, ADVA HOLDINGS,
 LLC, ENCOMPASS SPECIALTY
 NETWORK, LLC,
 Defendants.

Case No.: 3:19-cv-08337-VC

**STIPULATION AND [PROPOSED]
 ORDER TO TRANSFER CASE TO THE
 MIDDLE DISTRICT OF FLORIDA**

Judge: Honorable Vice Chhabria
 Dept.: 4

Amended Complaint Filed: 08/07/20

STIPULATION TO TRANSFER

Now come the above-referenced parties, by and through their respective counsel,
 pursuant to 28 U.S.C. § 1404(a), and for the convenience of the parties hereby request and
 stipulate to the transfer of this case to the United States District Court for the Middle District of
 Florida, Tampa Division, where all parties consent to jurisdiction. Plaintiff filed this action on
 December 20, 2019 against Defendant Paradigm Management Services, LLC. On August 8,
 2020, Plaintiff filed its Amended Class Action Complaint which added Adva Holdings, LLC and
 Encompass Specialty Network, LLC as defendants. On August 28, 2020, Defendants Adva

Holdings, LLC and Encompass Specialty Network, LLC filed a Motion to Dismiss arguing that this Court lacks personal jurisdiction over each of them as they are each headquartered in the State of Florida. On November 9, 2020, the Parties participated in a mediation before Hon. Edward A. Infante (Ret.) of JAMS. In connection with that mediation the Parties are continuing to discuss and document the terms of a settlement, but the Parties have agreed that jurisdiction is proper in the Middle District of Florida, and the case should promptly be transferred to the U.S. District Court for the Middle District of Florida.

Accordingly, the Parties hereby stipulate that, under 28 U.S.C. § 1404(a), the Middle District of Florida, Tampa Division, is the appropriate venue for this action, and that this action should be transferred to that venue for the convenience of parties and witnesses and in the interests of justice.

DATED: November 13, 2020

Stipulated and Respectfully Submitted,

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By: /s/ Molly K. McGinley

By: /s/ Randall K. Pulliam

Attorneys for Defendants

Attorneys for Plaintiff

**[PROPOSED] ORDER APPROVING STIPULATION TO
TRANSFER CASE TO THE MIDDLE DISTRICT OF FLORIDA**

ORDER

AND NOW, this _____ day of _____, 2020, upon review of the parties' Stipulation to Transfer, the Stipulation is hereby approved and the Court hereby directs the Clerk's Office to transfer the matter to the United States District Court for the Middle District of Florida, Tampa Division.

IT IS SO ORDERED.

HON. VINCE CHHABRIA
UNITED STATES DISTRICT COURT JUDGE